

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**STEVE M. BAJIC,
RAJESH TANEJA,
NORFOLK HEIGHTS LTD.,
FOUNTAIN DRIVE LTD.,
ISLAND FORTUNE GLOBAL LTD.,
CRYSTMOUNT LTD.,
WISDOM CHAIN LTD.,
SSID LTD.,
SURE MIGHTY LTD.,
TAMARIND INVESTMENTS INC.,
KENNETH CIAPALA,
ANTHONY KILLARNEY,
BLACKLIGHT SA,
CHRISTOPHER LEE MCKNIGHT, and
AARON DALE WISE,**

Defendants.

Civil Action No. 1:20-CV-00007-LGS

JOINT STATUS REPORT

Pursuant to the Court's Order dated February 23, 2021 (Dkt. No. 239), the undersigned parties, including plaintiff Securities and Exchange Commission ("Commission"), Steve Bajic, Kenneth Ciapala, Anthony Killarney, Rajesh Taneja and Christopher McKnight, provide the following status report to describe the status as to each defendant and the items referenced in Rule IV.A.2 of the Court's Individual Rules.

Status as to Remaining Individual Defendants

A. Defendant Bajic

The time to respond to the Complaint for defendant Bajic has been extended to April 30, 2021. *See* Dkt. No. 239. The Commission's counsel and Bajic have been involved in extensive

settlement negotiations and have reached an agreement in principle as to some of the terms of a settlement but are still working to reach agreement on other terms. The Commission's counsel and Bajic believe that additional time to allow their settlement negotiations to proceed would be useful and that it is unlikely that they will litigate this case. Accordingly, Bajic requests that his time to respond to the Complaint, which is currently set for April 30, 2021, be adjourned until June 7, 2021. The Commission assents to this request.

B. Defendant Ciapala

The Commission's counsel and Ciapala's counsel have reached an agreement to settle the Commission's claims against defendant Ciapala. The parties are currently in the process of completing the documents that will need to be filed with the Court, and contemplate that, within the next week, they will submit their agreement in the form of a motion for entry of judgment, attaching the proposed final judgment and consent agreement, for the Court's approval. The parties do not believe that it will be necessary to request a further extension of Ciapala's deadline to respond to the Complaint, which is currently May 7, 2021. *See* Dkt. No. 244.

Anticipated Motions

The Court has already entered partial judgments against defendants Rajesh Taneja, Christopher McKnight and Anthony Killarney. *See* Dkt. Nos. 215 (Taneja), 218 (McKnight), 237 (Killarney). The judgment against defendant Taneja leaves open the option for the Commission to file a motion seeking civil penalties if the parties are unable to reach agreement on that issue. The judgments against defendants McKnight and Killarney leave the questions of disgorgement, prejudgment interest and civil penalty for the Court to decide on the motion of the Commission if the parties are unable to reach agreement on those issues. The Commission does

not anticipate filing such motions until at least June 2021 while the parties continue their discussions on those issues.

Commission's Claims Against The Other Defendants Are Completely Resolved

The Commission's claims as to defendants Norfolk Heights Ltd., Fountain Drive Ltd., Island Fortune Global Ltd., Crystalmount Ltd., Wisdom Chain Ltd., and Sure Mighty Ltd. were resolved by the entry of final judgments against them on May 7, 2020. The Commission's claims as to defendant Aaron Wise were resolved by the granting of a final judgment against him on November 23, 2020. *See* Dkt. No. 219. The Commission's claims as to defendants Blacklight SA, Tamarind Investments Inc. and SSID Ltd. were resolved by the granting of final judgments against them on February 23, 2021.

Dated: April 23, 2021

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

/s/ Kathleen Shields

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CERTIFICATE OF SERVICE

I hereby certify that, on April 23, 2021, a true and correct copy of this document was filed through the Court's CM/ECF system, and accordingly, this document will be sent electronically to all participants registered to receive electronic notice in this case, and that I will serve the document via e-mail upon the remaining parties not registered to receive electronic notice through the CM/ECF system.

/s Kathleen Shields
Kathleen Shields